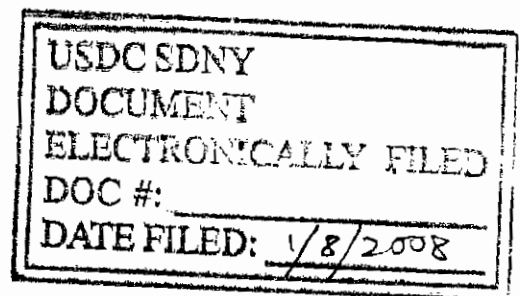


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



HILLARY WHITE and LYNN MICHALSON,
individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

AURORA DAIRY CORPORATION,
d/b/a Aurora Organic Dairy,

Defendant.

07 Civ. 9418 (DAB)

**STIPULATION
EXTENDING TIME TO
ANSWER OR OTHERWISE
PLEAD IN RESPONSE TO
PLAINTIFFS' COMPLAINT**

Defendant Aurora Dairy Corporation ("Defendant" or "Aurora") and Plaintiffs Hillary White and Lynn Michalson ("Plaintiffs") (collectively, the "Parties"), by and through their attorneys, hereby stipulate and agree to extend the time for Aurora to answer or otherwise plead in response to Plaintiffs' Complaint pending resolution of motions for transfer and consolidation currently pending before the United States Judicial Panel on Multidistrict Litigation ("Multidistrict Panel"). For the reasons set forth below, the parties stipulate that Defendant shall be granted twenty (20) days after resolution by the Multidistrict Panel of the foregoing consolidation motions to answer or otherwise plead in response to Plaintiffs' Complaint.

STIPULATION

1. The instant lawsuit is one of several class action lawsuits recently filed against Aurora. See Schedule of Actions, Ex. A hereto. A total of eleven such suits are currently pending. Ten of those suits are currently pending in six different judicial districts before ten different federal judges. The eleventh suit is pending in the state court in California.

2. On October 19, 2007, plaintiffs in one of the foregoing suits filed a petition, pursuant to 28 U.S.C. § 1407 (2000), with the Multidistrict Panel to transfer the lawsuits to a single court for coordinated pretrial management. See Motion of Plaintiffs Rebecca and Fernando Freyre For Transfer And Coordination Or Consolidation Under 28 U.S.C. § 1407, Ex. B hereto.

3. The Multidistrict Panel has indicated it will hear oral argument with respect to the foregoing and related motions on January 30, 2008. See Dec. 13, 2007 Notice of Hearing Session, Ex. C hereto.

4. Aurora was originally scheduled to answer or otherwise plead in response to Plaintiffs' Complaint on or before December 31, 2007.

5. Aurora believes that an extension of time pending the Multidistrict Panel's ruling is necessary and appropriate to prevent unfair prejudice and a waste of resources. See, e.g., Rosenfeld v. Hartford Fire Ins. Co., Nos. 88 Civ. 2153 (MJL), 88 Civ. 2252 (MJL), 1988 WL 49065, at *1 (S.D.N.Y. May 12, 1988). Aurora believes that it should not be required to answer or otherwise plead prior to the resolution of the consolidation motion pending before the Multidistrict Panel. See id.

6. Aurora further believes that an extension of time pending a ruling by the Multidistrict Panel is necessary and appropriate in order to conserve judicial resources in the management of the instant lawsuit. See, e.g., Rivers v. Walt Disney Co., 980 F. Supp. 1358, 1362 (C.D. Cal. 1997). By granting an extension of time, the Court will avert the possibility of the needless expenditure of time and energy and will avoid potential duplication of case management. See id. at 1360.

7. Plaintiffs have no objection to extending the time for Aurora to respond prior to the resolution of the consolidation motion pending before the Multidistrict Panel.

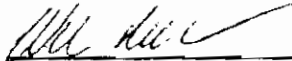
8. No prior extensions of time have been sought by the Parties.

9. The requested extension will not affect the current case schedule in any way.

10. The parties hereby STIPULATE AND AGREE that Defendant shall be granted twenty (20) days after resolution by the Multidistrict Panel of the aforementioned transfer and consolidation motions to answer or otherwise plead in response to Plaintiffs' Complaint.

Dated: New York, New York
December 31, 2007

LATHAM & WATKINS LLP

By: 
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Aurora Dairy Corporation

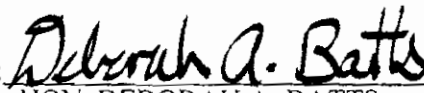
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Attorney for Plaintiffs
Hillary White and Lynn Michalson

SO ORDERED:

By: 
HON. DEBORAH A. BATTS
U.S.D.J., United States District Court for the
Southern District of New York

Dated: 1/8/08